

# EXHIBIT T

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Before The Honorable Richard Seeborg

ANIBAL RODRIGUEZ, et al.,	)	
	)	
Plaintiffs,	)	
	)	
VS.	)	NO. 3:20-cv-04688 RS
	)	
GOOGLE, LLC,	)	
	)	
Defendant.	)	
	)	

San Francisco, California  
Thursday, July 25, 2024

**TRANSCRIPT OF PROCEEDINGS**

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(Appearances continued on next page)

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**PROCEEDINGS**

1 logs associated with the transmission of  
2 app-interaction/measurement data to Google via Google  
3 Analytics for Firebase when a user has turned WAA off."  
4 So we're talking about when they've turned WAA off. It  
5 then says:

6 "Google states, however, that it is not practical or  
7 relevant to account for every single potential data source  
8 (including logs) that may contain such data because there  
9 are various downstream users of the pseudonymous data."

10 Okay. Various downstream uses, so many that they can't  
11 even count them. They can't even tell us in an interrogatory.

12 The Hochman report, our expert report, at paragraph 273 is  
13 the one I've got here, where it says:

14 "Google's collection of WAA/sWAA-off data also  
15 enables Google to serve targeted advertisements."

16 We took a deposition of a former Google software engineer,  
17 Blake Lemoine, and he testified about how they used WAA-off  
18 data for their AI.

19 The Hochman report, paragraphs 102 and 305, also have  
20 additional detail.

21 But interrogatory number 15, if I can go to my chart 28,  
22 we said interrogatory 15:

23 "Please describe how Google currently uses and  
24 previously during the class period has used WAA-off data."

25 So -- and you'll see the response is here, and they say at